

**Texas Eastern Transmission LP
Texas Eastern Transmission, LP - West Monroe Compressor Station
West Monroe, Ouachita Parish, Louisiana
Agency Interest Number: 8241**

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Texas Eastern Transmission LP
Texas Eastern Transmission, LP - West Monroe Compressor Station
West Monroe, Ouachita Parish, Louisiana
Agency Interest Number: 8241
Activity Number: PER20090001
Proposed Permit Number: 2160-00051-V2**

I. APPLICANT

Company:

Texas Eastern Transmission, LP
PO Box 1642
Houston, Texas 77251-1642

Facility:

Texas Eastern Transmission, LP - West Monroe Compressor Station
309 Worthy Rd
West Monroe, Ouachita Parish, Louisiana
Approximate UTM coordinates are 576.432 kilometers East and 3602.630 kilometers North, Zone 15.

II. FACILITY AND CURRENT PERMIT STATUS

The West Monroe Compressor Station employs three reciprocating internal combustion gas-fired engines to recompress and move natural gas through transmission pipelines. Line pressure must be maintained in order to ensure that natural gas moves at sufficient volumes for reliable service at all delivery points. Various support activities are performed at the West Monroe Compressor Station to maintain proper operation of the engines and ancillary equipment. Pipeline liquids (condensate) is collected through a diffuser vessel (121-DV1) that empties into a collection tank (T-1) and ultimately stored in an accumulator tank (T-2) until transported off-site by tank truck where area fugitive emission from loading activities (TLOAD) occurs. Tanks are also used to store lube oil, used lube oil, engine coolant (glycol). One auxiliary engine (E-4) is maintained on-site to generate emergency power in the event of a loss of grid electrical power. Fugitive emissions (FG-1) from the facility consist of leaks from pipeline components; discrete

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gas releases from blowdowns, purges, scheduled maintenance, and emergency events are emitted from miscellaneous process vents (MPV).

In this permit renewal no physical modification was proposed. The emissions from Emission Points T-1, T-2, FG-1, MPV-1, and DV-1 were reconciled.

Texas Eastern Transmission, LP - West Monroe Compressor Station is a designated Part 70 source. Several Part 70 permits have been issued to the operating units within the facility. These include:

Permit No.	Unit or Source	Date Issued
2160-00051-V0	West Monroe Compressor Station	October 12, 1998
2160-00051-V0 (Administrative Amendment)	West Monroe Compressor Station	March 4, 2004
2160-00051-V1	West Monroe Compressor Station	March 11, 2005

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on September 3, 2009 requesting a Part 70 operating permit renewal for the West Monroe Compressor Station.

Project

In this permit renewal no physical modification was proposed. The emissions from Emission Points T-1, T-2, FG-1, MPV-1, and DV-1 were reconciled.

Proposed Permit

Permit 2160-00051-V2 will be the renewal of Part 70 operating permit 2160-00051-V1 for the West Monroe Compressor Station.

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Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	13.73	13.73	-
SO ₂	0.18	0.18	-
NO _x	1451.85	1451.85	-
CO	92.56	92.56	-
VOC	56.63	51.49	-5.14

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

ID No.	Requirement	Note
UNF1	Chemical Accident Prevention and Minimization of Consequence [40 CFR 68]	DOES NOT APPLY. By definition, a Stationary Source subject to Part 68 does not include transportation subject to DOT oversight or regulation under. The West Monroe compressor station is regulated by DOT.
	NSPS Subpart KKK – Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants [40 CFR 60.630]	DOES NOT APPLY. The facility is not an onshore natural gas processing plant.
EQT 11 EQT 12 EQT 13 EQT 14 Internal Combustion	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.A] NSPS Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (ICE) [40 CFR 60.4230]	DOES NOT APPLY. Units emit less than 5 tons of SO ₂ per year. DOES NOT APPLY. The engines did not commence modification or reconstruction after June 12, 2006.

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Engines	NESHAP Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6590]	DOES NOT APPLY. The engines are at an area HAP source but did not commence modification or reconstruction after June 12, 2006.
EQT 15 Pipeline Liquids Collector Tank	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. The tank commenced construction, reconstruction, or modification in 1983, but its capacity is less than 40,000 gallons.
	Storage of Volatile Organic Compounds [LAC 33:III.2103.G]	EXEMPT. The tank having a capacity of less than 420,000 gallons is used to store condensate and not subject to NSPS.
EQT 16 Pipeline Liquids Storage Tank	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The tank commenced construction, reconstruction, or modification in 1991, but its capacity is less than 40,000 gallons.
	Storage of Volatile Organic Compounds [LAC 33:III.2103.G]	EXEMPT. The tank having a capacity of less than 420,000 gallons is used to store condensate and not subject to NSPS.
RLP 11 Pipeline Liquids Diffuser Vessel Vent	Crude Oil and Condensate Flash Emissions [LAC 33:III.2104.A]	DOES NOT APPLY. Potential condensate flash emissions at West Monroe are less than 100 TPY.
EQT 17 Tank Truck Loading	Volatile Organic Compounds – Loading [LAC 33:III.2107.A.1.a]	DOES NOT APPLY. Throughput does not exceed 20,000 or 40,000 gallons per day.

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Prevention of Significant Deterioration/Nonattainment Review

Emissions of criteria pollutants will be below the PSD major source threshold of 250 tons/year. PSD review is not required.

Streamlined Equipment Leak Monitoring Program

The permit does not include any Streamlined Equipment Leak Monitoring Program.

MACT Requirements

MACT requirements apply to the facility that emits hazardous air pollutants (HAP) above the major source threshold. The West Monroe Compressor Station is a minor source of HAP emissions.

Air Quality Analysis

Emissions associated with the proposed renewal were reviewed by the Air Quality Assessment Division to ensure compliance with NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

This permit does not contain any permit shield.

VI. PERIODIC MONITORING

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permits.

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.